

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE  
ARCHDIOCESE OF SANTA FE, a New  
Mexico corporation sole,

Debtor.

Chapter 11

Case No. 18-13027-t11

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE**

TO THE DEBTOR, ITS ATTORNEYS OF RECORD, AND ALL PARTIES IN  
INTEREST:

**PLEASE TAKE NOTICE** that Arrowood Indemnity Company, formerly known as Royal Indemnity Company, successor by merger to Royal Insurance Company of America ("Arrowood"), files this Notice of Appearance and Request for Notice pursuant to Bankruptcy Rules 2002, 9007 and 9010 and requests that all notices given or required to be given and all documents served or required to be served in this case be given to or served on its counsel as follows:

Bruce D. Celebrezze, Esq.  
Clyde & Co US LLP  
Four Embarcadero Center, Suite 1350  
San Francisco, CA 94111  
Telephone: (415) 365-9870  
Email: [bruce.celebrezze@clydeco.us](mailto:bruce.celebrezze@clydeco.us)

The foregoing request includes not only notices and papers referred to in the Rules specified above and any other applicable provision, but also includes, without limitation, orders and notices of all filings with respect to any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, telecopy or otherwise, which affects or seeks to affect in any way, any rights or interests of the Debtor or any creditor, equity security holder, party in interest, and/or any other person or entity.

Arrowood submits this notice and request as a special appearance which is not to be deemed a consent to or waiver of the right to challenge the jurisdiction of the Bankruptcy Court, including, without limitation, the jurisdiction of the Court to

adjudicate non-core matters or the waiver of a right to a jury trial, all of which Arrowood reserves without prejudice.

This the 13th day of August, 2021.

Respectfully submitted,

CLYDE & CO US LLP

By: /s/ Bruce D. Celebrezze  
Bruce D. Celebrezze  
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***Attorney for Arrowood Indemnity Company***

### **CERTIFICATE OF SERVICE**

In accordance with New Mexico Local Bankruptcy Rule 9036-1, Rule 7005 of the Federal Rules of Bankruptcy Procedure, and Rule 5(3) of the Federal Rules of Civil Procedure, I hereby certify that on August 13, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such to all parties appearing in the action.

This the 13th day of August, 2021.

By: /s/ Bruce D. Celebrezze  
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